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9

10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**

12 JWAL SHELAT, individually and on
behalf of all other similarly situated,

13 Plaintiff,

14 v.

15 KAIZENCURE LLC, d/b/a CRAFTORIA,

16 Defendant.

17 Case No. 3:24-cv-04696-AMO

18 Hon. Araceli Martínez-Olguín

19 **JOINT STIPULATION AND
PROPOSED ORDER REGARDING
DISCOVERY**

20 WHEREAS, on January 9, 2025, Defendant filed a Motion to Stay Discovery (the “Motion”)
21 [DE 31] pending the resolution of its Motion to Dismiss [DE 27]; and

22 WHEREAS, as of January 31, 2025, Defendant’s Motion is fully briefed and ripe for
decision; and

23 WHEREAS, the undersigned Parties met and conferred to discuss the current discovery
24 schedule in light of the pending Motion:

25 IT IS HEREBY STIPULATED AND AGREED THAT, subject to the Court’s approval:

26 1. All deadlines for discovery are stayed pending resolution of Defendant’s Motion.
27 2. No later than two weeks after the Court issues an order resolving Defendant’s
Motion, the Parties shall file an updated Joint Case Management Statement and
Proposed Case Management Order with the Court.

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2 Dated: February 18, 2025

Respectfully submitted,

3 /s/ Neal J. Deckant

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3 /s/ Brianna K. Pierce

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Attorneys for Defendant

Attestation Pursuant to Civil Local Rule 5-1(i)

Pursuant to Civil Local Rule 5-1(i)(3), the filer of this document hereby attests that concurrence in the filing of the document has been obtained from each of the other Signatories.

Dated: February 18, 2025

Respectfully submitted,

/s/ Brianna K. Pierce

1 **CERTIFICATE OF SERVICE**

2 No. 3:24-cv-04696-AMO

3 I certify that I served a copy of this document on the Court and all parties by filing this
4 document with the Clerk of the Court through the CM/ECF system, which will provide electronic
5 notice and an electronic link to this document to all counsel of record.

6

7 Dated: February 18, 2025

Respectfully submitted,

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9 /s/ Brianna K. Pierce

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

10 JWAL SHELAT, individually and on
11 behalf of all other similarly situated.

12 Plaintiff,
v.

13 KAIZENCURE LLC, d/b/a CRAFTORIA,

14 Defendant.

Case No. 3:24-cv-04696-AMO

Hon. Araceli Martínez-Olguín

[PROPOSED] ORDER REGARDING DISCOVERY

16 The Court, having considered the parties' Joint Stipulation Regarding Discovery, and with
17 good cause appearing, hereby orders as follows:

18 1. All deadlines for discovery are stayed pending resolution of Defendant's Motion to
19 Stay Discovery [DE 31].

20 2. No later than two weeks after the Court issues an order resolving Defendant's
21 Motion to Stay Discovery [DE 31], the Parties shall file an updated Joint Case Management
22 Statement and Proposed Case Management Order with the Court.

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Date:

Hon. Araceli Martínez-Olguín
United States District Judge